

SMITH | VILLAZOR

Smith Villazor LLP
250 West 55th Street, 30th Floor
New York, NY 10019
www.smithvillazor.com

PATRICK J. SMITH
T 212 582 4400
patrick.smith@smithvillazor.com

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BY E-MAIL to NathanNYSDChambers@nysd.uscourts.gov

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Maxwell, No. 20 Cr. 330

Dear Judge Nathan:

We represent Jordana H. Feldman, the independent administrator of the Epstein Victims' Compensation Program, the litigation-alternative program established to confidentially resolve claims of sexual abuse against Jeffrey Epstein, his Estate, and other related individuals and entities. This afternoon we were informed by counsel for the government that the defendant has sought, and the Court intends to authorize, a subpoena directed to Ms. Feldman under Federal Rule of Criminal Procedure 17(c) for certain documents. We write to (i) inform the Court that we are authorized to accept service of the subpoena on behalf of Ms. Feldman, and (ii) request a briefing schedule for Ms. Feldman's anticipated motion to quash the subpoena.

We understand that the government intends to file a motion to quash the subpoena, with a deadline of this Wednesday, November 17, 2021. Given that we have just learned of the subpoena today, the issues it presents, and mindful of the impending start date of trial, we respectfully request until November 23, 2021 to file a motion to quash on Ms. Feldman's behalf.

We are available should the Court have any questions.

Respectfully submitted,

/s/ Patrick J. Smith

Patrick J. Smith
Smith Villazor LLP

cc: AUSA Alison Moe, AUSA Maurene Comey, AUSA Andrew Rohrbach, AUSA Lara Pomerantz, Christian R. Everdell, Esq., Jeffrey S. Pagliuca, Esq., Laura A. Menninger, Esq., Mark Stewart Cohen, Esq., Bobbi C. Sternheim, Esq. (by e-mail)